

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

Complaint on First-Class Mail
Service Standards

Docket No. C2001-3

OBJECTION OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORY OF DOUGLAS CARLSON
(March 25, 2002)

In accordance with Rule 26 of the Commission's Rules of Practice and Procedure, the United States Postal Service hereby files this notice of its objection to the following interrogatory, which was filed on March 18, 2002: DFC/USPS-GAN-60.

This interrogatory requests that the Postal Service, "[b]y name and title, . . . identify the person or persons on the Service Standards team who held the highest, or most senior, title or rank in the Postal Service."

The ostensible purpose of this proceeding is to resolve whether certain First-Class Mail service standard changes made during 2000 and 2001 were procedurally compliant with 39 U.S.C. 3661 and substantively compliant with 39 U.S.C. 3662. The nature of the changes are not in dispute and the Postal Service has been affirmative and forthcoming in disclosing information about them. The Postal Service has offered several Declarations from Mr. Charles Gannon, who served as Team Leader for the project. He has answered scores of interrogatories, in addition to the hundreds of interrogatories answered institutionally. There are outstanding responses due and the Postal Service expects to make progress in the near future to provide them.

The purposes of this proceeding, however, are not advanced by DFC/USPS-GAN-60. The Service Standards Team, headed by Mr. Gannon, implemented the service standard changes that are the subject of this proceeding. Regarding the Commission's resolution of the application of sections 3661 and 3662, it is irrelevant who on the Service Standards Team "held the highest, or most senior, title or rank" at

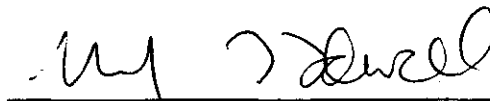
any given time. Accordingly, the Postal Service regards this interrogatory as requesting information as irrelevant as the list of the names of "Headquarters and Field employees who served on the Process Review Team." See Presiding Officer's Ruling No. C2001-3/3 at 12 (November 14, 2001).

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

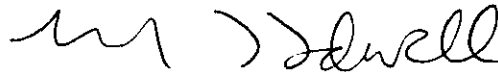
Daniel J. Foucheaux, Jr.
Chief Counsel
Ratemaking



Michael T. Tidwell
Attorney

CERTIFICATE OF SERVICE

I hereby certify that, in accordance with section 12 of the Rules of Practice, I have this day served the foregoing document all parties of record in this proceeding.



Michael T. Tidwell

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